IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of: §
    Christoph T. Corvin §
§   Group Art Unit: 2161
Serial No.:   09/747,040 §
§   Examiner: Felten, Daniel S.
Filed: December 22, 2000 §
§
For: MEDICAL DIAGNOSTIC SYSTEM §   Atty. Docket: GEMS:0123/YOD/SWA
    ACQUISITON AND FINANCING §   15-EC-5764
    METHOD AND APARATUS §

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APPEAL BRIEF PURSUANT TO 37 C.F.R. §§ 41.31 AND 41.37

This Appeal Brief is being filed in furtherance to the Notice of Appeal mailed on September 25, 2006, and received by the Patent Office on September 29, 2006.

The Commissioner is authorized to charge the requisite fee of $500.00, and any additional fees which may be necessary to advance prosecution of the present application, to Account No. 07-0845, Order No. 15-EC-5794/YOD/SWA (GEMS:0123).

1. **REAL PARTY IN INTEREST**

The real party in interest is General Electric Company, the Assignee of the above-referenced application by virtue of the Assignment recorded at reel 011419, frame 0750, and recorded on December 22, 2000. General Electric Company, the Assignee of the above-referenced application, as evidenced by the documents mentioned above, will be directly affected by the Board's decision in the pending appeal.

2. **RELATED APPEALS AND INTERFERENCES**

Appellants are unaware of any other appeals or interferences related to this Appeal. The undersigned is Appellants' legal representative in this Appeal.

3. **STATUS OF CLAIMS**

Claims 1-9, 11-19, 21-37, 39-43 and 45-60 are currently pending, and are currently under final rejection and, thus, are the subject of this appeal.

4. **STATUS OF AMENDMENTS**

All amendments in relation to the claims of the present patent application have been entered, and no amendments have been submitted or entered subsequent to the Final Office Action mailed on May 18, 2006.

5. **SUMMARY OF CLAIMED SUBJECT MATTER**

The Application contains sixteen independent claims, namely, claims 1, 17, 33, 40, and 49-60, all of which are the subject of this Appeal. The subject matter of these claims is summarized below. The subject matter of dependent claims 3, 19, and 39 are also summarized.

Claim 1 recites a method for analyzing transactions (e.g., lease, purchase) for medical resources (e.g., medical diagnostic systems, real estate) in a medical facility (e.g., hospital), the method including: providing access to a financial analysis system

(e.g., data processing system 22, processing system 98, financial engine 100) for a medical resource supplier via a network (e.g., via remote client units 24, management station 70, access network 80); providing a network interface (e.g., via communication system 10, workstation 72 and monitor 74) for communication with the financial analysis system (e.g., via communication device 92), the network interface including a form (e.g., pages 94, query form 118, query form 210, query form 298, see Figs. 4-8) for entering client data (e.g., client 90 data) for medical resources; receiving the client data from the network interface via the network, wherein receiving the client data comprises receiving client trade-in data for a purchasing transaction for medical resources; analyzing the client data in the financial analysis system; providing a plurality of financial transaction options (e.g., financing options 430, via financing form 420, via financial engine 100) tailored to the client data; and transmitting the plurality of financial transaction options to a client via the network. *See, e.g.*, Application, page 5, line 27 – page 7, line 6; page 8, line 27 – page 9, line 18; page 10, line 22 - page 11, line 21; page 12, lines 19-21; page 13, lines 5-22; page 15, lines 17-2; page 16, lines 9-11; page 18, lines 28 - page 20, line 12; Figs. 1, 2, and 4-8.

Claim 17 recites a system for analyzing resource transactions (e.g., lease, purchase) for a medical facility (e.g., hospital), the system including: a client computer system (e.g., remote client unit 24) for a medical facility; a transactional analysis system (e.g., data processing system 22, processing system 98) for a medical resource supplier; a network (e.g., network access 80) for coupling the client computer system to the transactional analysis system; and a financial analysis module (e.g., financial engine 100) operative on the transactional analysis system for determining terms of a financial transaction based upon client data (e.g., client 90 data), the client computer system being configured to transmit client data to the financial analysis module, and the financial analysis module being configured to evaluate the client data and to generate a plurality of financial transaction options (e.g., financing options 430, via financing form 420, via financial engine 100) tailored to the client data, wherein the client data comprises trade-in

data for a client trade-in with the financial transaction. *See, e.g.*, Application, page 5, line 27 – page 7, line 6; page 8, line 27 – page 9, line 18; page 10, line 22 - page 11, line 21; page 12, lines 19-21; page 13, lines 5-22; page 15, lines 17-2; page 16, lines 9-11; page 18, lines 28 - page 20, line 12; Figs. 1, 2, and 4-8.

Claim 33 recites a method for facilitating a purchasing transaction (e.g., lease, purchase) between a medical resource supplier and a client, the method including: providing access to a transaction system (e.g., data processing system 22, processing system 98) for a medical resource supplier via a network (e.g., via remote client units 24, management station 70, access network 80); providing an interface for exchanging information between a client and the transaction system (e.g., via communication system 10, workstation 72 and monitor 74), wherein the interface has fields for entering client data (e.g., on pages 94, query form 118, query form 210, query form 298, see Figs. 4-8); receiving the client data from the interface via the network, wherein receiving the client data comprises receiving client trade-in information for a purchasing transaction for medical resources; financially analyzing (e.g., via financial engine 100) at least a portion of the client data with a financial analysis system operative on the transaction system; generating a plurality of purchasing options (e.g., financing options 430, via financing form 420) tailored to the client data; and transmitting the plurality of purchasing options to the client via the network, wherein the plurality of purchasing options comprise lease and loan options. *See, e.g.*, Application, page 5, line 27 – page 7, line 6; page 8, line 27 – page 9, line 18; page 10, line 22 - page 11, line 21; page 12, lines 19-21; page 13, lines 5-22; page 15, lines 17-2; page 16, lines 9-11; page 18, lines 28 - page 20, line 12; Figs. 1, 2, and 4-8.

Claim 40 recites a method for providing medical resources (e.g., medical diagnostic systems, human resources) to a medical facility (e.g., hospital), the method including: providing access to a financial module (e.g., financial engine 100) for a medical resource supplier via a network (e.g., via remote client units 24, management

station 70, access network 80); providing a communication interface comprising fields for transmitting client data to the financial module (e.g., via communication system 10, workstation 72 and monitor 74, query form 118, query form 210, query form 298), wherein the client data includes a medical system category; receiving client trade-in information at the financial module; financially analyzing at least a portion of the client data with the financial module; generating a plurality of transaction options (e.g., financing options 430, via financing from 420, via financial engine 100) tailored to the client data; and transmitting the plurality of transaction options to a client via the network. *See, e.g.*, Application, page 5, line 27 – page 7, line 6; page 8, line 27 – page 9, line 18; page 10, line 22 - page 11, line 21; page 12, lines 19-21; page 13, lines 5-22; page 15, lines 17-2; page 16, lines 9-11; page 18, lines 28 - page 20, line 12; Figs. 1, 2, and 4-8.

Claims 49, 50, 53-55 generally relate to a method for analyzing transactions (e.g., lease, purchase) for medical resources (e.g., medical diagnostic systems, MRI, CT) in a medical facility (e.g., hospital), the method including: providing access to a financial analysis system (e.g., data processing system 22, processing system 98) for a medical resource supplier via a network (e.g., via remote client units 24, management station 70, access network 80); providing a network interface for communication with the financial analysis system (e.g., via communication system 10, workstation 72 and monitor 74), the network interface including a form (e.g., on pages 94, query form 118, query form 210, query form 298, see Figs. 4-8) for entering client data for medical resources; receiving the client data from the network interface via the network; analyzing the client data in the financial analysis system; providing a plurality of financial transaction or purchasing options (e.g., financing options 430, via financing from 420, via financial engine 100) comprising a lease and/or loan option tailored to the client data; and transmitting the plurality of financial transaction options to a client via the network. *See, e.g.*, Application, page 5, line 27 – page 7, line 6; page 8, line 27 – page 9, line 18; page 10, line 22 - page 11, line 21; page 12, lines 19-21; page 13, lines 5-22; page 15, lines 17-2; page 16, lines 9-11; page 18, lines 28 - page 20, line 12; Figs. 1, 2, and 4-8.

Claims 56-58 generally relate a program for facilitating a purchasing transaction between a medical resource supplier (e.g., of medical diagnostic systems) and a client, including: a machine readable medium; and machine readable code disposed on machine readable medium and adapted for: providing access to a transaction system (e.g., data processing system 22, processing system 98) for a medical resource supplier via a network (e.g., via remote client units 24, management station 70, access network 80); providing an interface (e.g., via communication system 10, workstation 72 and monitor 74) for exchanging information between a client and the transaction system, wherein the interface has fields (e.g., on pages 94, query form 118, query form 210, query form 298, see Figs. 4-8) for entering client data (e.g., client 90 data) ; receiving the client data from the interface via the network, wherein receiving the client data comprises receiving client trade-in information for a purchasing transaction for medical resources; financially analyzing at least a portion of the client data with a financial analysis system operative on the transaction system; generating a plurality of purchasing options (e.g., financing options 430, via financing from 420, via financial engine 100) tailored to the client data; and transmitting the plurality of purchasing options to the client via the network, wherein the plurality of purchasing options comprise lease and/or loan options. *See, e.g.*, Application, page 5, line 27 – page 7, line 6; page 8, line 27 – page 9, line 18; page 10, line 22 - page 11, line 21; page 12, lines 19-21; page 13, lines 5-22; page 15, lines 17-2; page 16, lines 9-11; page 18, lines 28 - page 20, line 12; Figs. 1, 2, and 4-8.

Claim 59 recites a program for providing medical resources (e.g., of medical diagnostic systems) to a medical facility (e.g., hospital), including: a machine readable medium; and machine readable code disposed on machine readable medium and adapted for: providing access to a financial module (e.g., financial engine 100) for a medical resource supplier via a network (e.g., via remote client units 24, management station 70, access network 80); providing a communication interface (e.g., via communication system 10, workstation 72 and monitor 74) comprising fields (e.g., on pages 94, query form 118, query form 210, query form 298, see Figs. 4-8) for transmitting client data to the financial module, wherein the client data includes a medical system category;

receiving client trade-in information at the financial module; financially analyzing at least a portion of the client data with the financial module; generating a plurality of transaction options (e.g., financing options 430, via financing from 420, via financial engine 100) tailored to the client data; and transmitting the plurality of transaction options to a client via the network. *See, e.g.,* Application, page 5, line 27 – page 7, line 6; page 8, line 27 – page 9, line 18; page 10, line 22 - page 11, line 21; page 12, lines 19-21; page 13, lines 5-22; page 15, lines 17-2; page 16, lines 9-11; page 18, lines 28 - page 20, line 12; Figs. 1, 2, and 4-8.

Claim 60 recites a program for providing medical resources to a medical facility (e.g., hospital), including: a machine readable medium; and machine readable code disposed on machine readable medium and adapted for: providing access to a financial module (e.g., data processing system 22, processing system 98) for a medical resource supplier via a network (e.g., via remote client units 24, management station 70, access network 80); providing a communication interface (e.g., via communication system 10, workstation 72 and monitor 74) comprising fields (e.g., on pages 94, query form 118, query form 210, query form 298, see Figs. 4-8) for transmitting client data to the financial module, wherein the client data includes a medical system category; financially analyzing at least a portion of the client data with the financial module; generating a plurality of transaction options (e.g., financing options 430, via financing from 420, via financial engine 100) tailored to the client data, wherein generating a plurality of transaction options comprises providing lease and loan options tailored to the client data; and transmitting the plurality of transaction options to a client via the network. *See, e.g.,* Application, page 5, line 27 – page 7, line 6; page 8, line 27 – page 9, line 18; page 10, line 22 - page 11, line 21; page 12, lines 19-21; page 13, lines 5-22; page 15, lines 17-2; page 16, lines 9-11; page 18, lines 28 - page 20, line 12; Figs. 1, 2, and 4-8.

Dependent Claims 3, 19, 39

Claim 3 depends from claim 1 and recites storing at least a portion of the client data on a server, and tailoring the form (e.g., query form 118) for the client according to the portion of client data. *See, e.g.*, Application, page 13, lines 18-20.

Claim 19 depends from claim 16 and recites that the set of financial rules (e.g., rules interface module) includes tax rules for evaluating tax consequences of the financial transaction. *See, e.g.*, Application, page 11, lines 23-24.

Claim 39 depends from claim 33 and recites that generating a plurality of purchasing options comprises providing a plurality of service options. *See, e.g.*, Application, page 17, lines 12-13.

6. **GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL**

First Ground of Rejection for Review on Appeal:

Appellant respectfully urges the Board to review and reverse the Examiner's first ground of rejection in which the Examiner rejected all pending claims 1-9, 11-19, 21-37, 39-43 and 45-60 under 35 U.S.C. § 103(a) as obvious over Hartley-Urquhart (U.S. Patent No. 6,167,305) and McCormack, Jr., "*A Worldwide Network of Supplies*" (hereinafter "McCormack").

Second Ground of Rejection for Review on Appeal:

Appellant respectfully urges the Board to review and reverse the Examiner's alternative rejection of claims 1-9, 11-19, 21-37, 39-43 and 45-60 under 35 U.S.C. § 103(a) as obvious over Hartley-Urquhart and McCormack, in further view of Kalbhen.

7.   **ARGUMENT**

As discussed in detail below, the Examiner has improperly rejected the pending claims. Further, the Examiner has misapplied long-standing and binding legal precedents and principles in rejecting the claims under Section 103. Accordingly, Appellant respectfully requests full and favorable consideration by the Board, as Appellant strongly believes that claims 1-9, 11-19, 21-37, 39-43 and 45-60 are currently in condition for allowance. Lastly, Appellant will address both grounds of rejection together in view of the alternative combinations formulated by the Examiner.

First and Second Grounds of Rejection

In the Final Office Action, the Examiner maintained the rejection of claims 1-9, 11-19, 21-37, 39-43 and 45-60 under 35 U.S.C. § 103(a) as obvious over Hartley-Urquhart (U.S. Patent No. 6,167,305) and McCormack, Jr., "*A Worldwide Network of Supplies*" (hereinafter "McCormack"), and alternatively, in further view of Kalbhen. Specifically, the Examiner stated:

Hartley-Urquhart discloses, as in claims 1, 17, 40, a method and system for supply chain financing which involves analyzing transactions for resources in a facility (buyer-210) (see col. 3, 11. 16+),

Providing access to financial analysis system (23) for a resource supplier via a network (240) (see col. 4, 11. 29+),

interface including a form (Purchase Order —PO) for entering client data for resources (see col. 4, 11. 36+),

receiving the client data from the network interface via the network (see col. 4, 11. 36+),

analyzing the client data in the financial analysis system (see col. 3, 11. 16+);

providing a plurality of financial transaction options tailored to the client data (see PO, col. 6, 11. 29-37; col. 8,

11. 50+); and transmitting the plurality of financial
transaction options to a client via the network (see col. 8,
11. 50+),

McCormack discloses receiving client trade data for
a purchasing transaction for medical resources. . .

On the other hand it would have been obvious . . . to
have employed the [used] medical supply equipment
websites mentioned by McCormack and Kalbhen (see
medibuy, neoforma, et al.,) . . .

Office Action Mailed March 21, 2005, pages 3-4. Appellant respectfully traverses these rejections.

Legal Precedent

First, during patent examination, the pending claims must be given an interpretation that is reasonable and consistent with the specification. *See In re Prater*, 415 F.2d 1393, 1404-05, 162 U.S.P.Q. 541, 550-51 (C.C.P.A. 1969) (emphasis added); *see also* M.P.E.P. §§ 608.01(o) and 2111. Indeed, the specification is "the primary basis for construing the claims." *See Phillips v. AWH Corp.*, No. 03-1269, -1286, at 13-16 (Fed. Cir. July 12, 2005) (citations omitted) (emphasis added).

Second, the burden of establishing a *prima facie* case of obviousness falls on the Examiner. *Ex parte Wolters and Kuypers*, 214 U.S.P.Q. 735 (PTO Bd. App. 1979). To establish a *prima facie* case, the Examiner must show that the combination includes *all* of the claimed elements, and also a convincing line of reason as to why one of ordinary skill in the art would have found the claimed invention to have been obvious in light of the teachings of the references. *Ex parte Clapp*, 227 U.S.P.Q. 972 (B.P.A.I. 1985). The Examiner must provide objective evidence, rather than subjective belief and unknown authority, of the requisite motivation or suggestion to combine or modify the cited references. *In re Lee*, 61 U.S.P.Q.2d. 1430 (Fed. Cir. 2002). One cannot use hindsight

reconstruction to pick and choose among isolated disclosures in the prior art to deprecate the claimed invention. *In re Fine*, 837 F.2d 1071, 5 U.S.P.Q.2d 1596 (Fed. Cir. 1988).

Third, if the Examiner relies on a theory of inherency, the extrinsic evidence must make clear that the missing descriptive matter is *necessarily* present in the thing described in the reference, and that it would be so recognized by persons of ordinary skill. *In re Robertson*, 169 F.3d 743, 49 U.S.P.Q.2d 1949 (Fed. Cir. 1999). The Examiner, in presenting the inherency argument, bears the evidentiary burden. *Ex parte Levy*, 17 U.S.P.Q.2d 1461, 1464 (Bd. Pat. App. & Inter. 1990).

Independent Claims 1, 40, 49, 50, 55, 59, 60

Independent claims 1, 40, 49, and 50 recite "providing access to a <u>financial analysis system</u> for a medical resource supplier via a network." Independent claims 50 and 60 recite "providing access to a <u>financial module</u> for a medical resource supplier via a network."

In contrast, the Hartley-Urquhart reference is absolutely devoid of a <u>financial analysis system</u> or <u>financial module</u>, much less such a system of *a resource supplier*, as claimed. The Examiner points, incorrectly, to the bank 230 in Hartley-Urquhart, which is clearly not a financial analysis system, as claimed. <u>Further, the bank 230 is associated with the buyer 220 and *not a supplier* 210</u>. *See* Hartley-Urquhart, col. 3, lines 14-34; col. 4, lines 29-35. Moreover, the bank 230 evaluates use of a supply-chain financing approach, and *does not analyze client data for obtaining a medical resource. See* Hartley-Urquhart, col. 3, lines 16-48.

The McCormack and Kalbhen references are also absolutely devoid of "providing access" to a "financial analysis system" or "financial module." Instead, McCormack is directed to the electronic exchange of purchasing-related information, such as product

availability, purchase orders, invoices, and payments. *See, e.g.*, McCormack, ¶ 4.
Kalbhen merely provides a list of on-line purchasing sites for used medical equipment.
See, e.g., Kalbhen, page 1. Kalbhen does not disclose a "financial analysis system" or
"financial module," as claimed.

In view of these deficiencies, independent claims 1, 40, 49, 50, 55, 59, and 60,
and their dependent claims, are believed to be patentable over Hartley-Urquhart,
McCormack, and Kalbhen, taken alone or in combination.

In the Final Office Action, the Examiner stated:

> In patent examination the examiner is charged with broadly
> interpretation [sic] of the claim language in light of the
> applicant's specification without reading limitation of the
> specification into the claims [see In re Hyatt]. In this case,
> a financial analysis system, it is being interpreted as any
> method that performs a financial calculation to provide
> financial information result. Here, financial analysis
> system is being interpreted as the *process*. Hartley-
> Urquhart discloses a financing systems and method via
> electronic accounting and management systems (see col. 4,
> lines 24-33).

> A financial module or providing access to a financial
> module is interpreted by the examiner as being a collection
> of software routine(s) inherently associated with the
> accounting and management systems that allows the
> electronic transmission of financial data. The examiner
> disagrees that the references are devoid of "providing
> access" to a "financial analysis system" or "financial
> module" because any thing related to the manipulation
> and/or management of money can also be considered
> within the realm of finance.

Final Office Action, pages 2-3 (emphasis in original).

Appellant respectfully reminds the Board that the Federal Circuit has emphasized that the specification is controlling in claim interpretation. Clearly, in view of the present specification and the general understanding of one skilled in the art, the bank 230 mentioned in the Hartley-Urquhart passage (col. 4, lines 24-33) cited by the Examiner would *not* be considered a financial analysis system (e.g., data processing system 22) of a medical resource supplier, as claimed. *See Phillips*, No. 03-1269, -1286, at 29 ("The specification is always highly relevant to the claim construction analysis. Usually, it is dispositive."); *Collegenet, Inc. v. ApplyYourself, Inc.*, No. 04-1202, -1222, 1251, at 8-9 (Fed. Cir. August 2, 2005) (holding that derivation of a claim term must be based on "usage in the ordinary and accustomed meaning of the words amongst artisans of ordinary skill in the relevant art").

Here, the Examiner has improperly isolated the phrase "financial analysis system" from the context of the specification and from the claim as a whole. *See Phillips*, at 33 (explaining that context must also play a role in claim construction). The Examiner has imposed an unreasonably broad interpretation on the present claim language. As clear from the specification and the claim language itself, the "financial analysis system" (or module) is a constituent of a "medical resource supplier," a phrase specifically recited in the claims. Surely, the Examiner does not equate a bank with a medical resource supplier. At the very least, the bank 230 operates for the *buyer* 220 and is *not* associated with a medical resource *supplier*, as claimed.

In operation, a customer or potential customer (e.g., hospital) uses the financial analysis system *of* the medical resource supplier to evaluate a specific transaction (e.g., purchase, lease, etc.) of a medical resource. Appellant emphasizes that the claimed financial analysis *system* (e.g., data processing system 22) cannot be reduced to an abstract process at the whim of the Examiner. *See* Final Office Action, page 3, first

paragraph; *see also Phillips*, at 16. (explaining that one should rely <u>heavily</u> on the <u>written description</u> for guidance as to the meaning of the claims). Again, Appellant respectfully asserts that the Examiner has not established a *prima facie* case of obviousness.

Independent Claims 1, 33, 40, 49

Independent claims 1 and 49, as amended, recite "providing a *<u>network interface</u>* for communication with the financial analysis system [of a medical resource supplier], the network interface including an *<u>electronic form for entering client data</u>* for medical resources." Independent claim 33, as amended, recites "providing an *<u>electronic interface</u>* for exchanging information between a client and the transaction system, wherein the interface has *<u>fields for entering client data</u>*." Independent claim 40, as amended, recites "providing a *<u>communication interface</u>* comprising *electronic fields* for transmitting client data to the financial module."

Conversely, the cited references, taken alone or in combination, do not teach or suggest an *electronic form* or *electronic fields* for entering or exchanging client data. For example, while Hartley-Urquhart discloses the transmission of a purchase order 235 via an electronic link 240, Hartley-Urquhart clearly does not teach or suggest an <u>electronic form</u> or <u>electronic fields</u> for *entering* client data. *See* Hartley-Urquhart, col. 4, lines 29-52. Similarly, while the McCormack reference may disclose the transfer of a purchase order as an attachment to an electronic message, for example, McCormack plainly does not disclose electronic <u>forms</u> or <u>fields</u> for *entering* client data. *See* McCormack, ¶ 4. After careful review of the list of "purchasing sites" in Kalbhen, the cited reference does not disclose an <u>electronic form</u> or <u>electronic fields</u> for <u>entering or exchanging client data</u>. *See*, generally, Kalbhen, pages 1-4.

Therefore, independent claims 1, 33, 40, and 49, and their dependent claims are believed to be patentable over Hartley-Urquhart, McCormack and Kalbhen, taken alone or in combination.

In the Final Office Action, the Examiner stated:

> In regards to suggesting "electronic form" or "electronic fields" again the examiner disagrees. Both the purchase order and an invoice are considered forms which have various fields of information that art attached to the form(s) (e.g., buyer's name, address, items being purchased, quantity of items, etc.). Both the purchase order and the invoice can be transmitted electronically over an electronic link (see col. 4, lines 41-62). It is submitted that when the purchase order and/or invoice are transmitted in electronically that they are in electronic form with fields being submitted in electronic form. Data is entered into the system electronically or it could not be sent via an electronic link.

Final Office Action, page 3.

In view of the Examiner's comments (from the Final Office Action) reproduced above, it is clear that the Examiner misses the point. Moreover, once again, the Examiner improperly <u>isolates</u> the claim terms (from the claim as a whole and from the specification) to impose an <u>unreasonably broad interpretation</u> on the claim language. The present claims and specification are very clear. An <u>interface</u> is provided so that a client or buyer (e.g., hospital) can input data (via an electronic form having data fields) <u>*directly*</u> to a financial analysis system <u>of</u> the medical resource <u>supplier</u>. In contrast, the Hartley-Urquhart purchase order (referred to by the Examiner) could be an electronic output having <u>no electronic *fields* for *entering*</u> data but an electronic output generated via prompted questions, for example. Or the purchase order could simply be a hardcopy (non-electronic) form completed non-electronically by hand and then scanned into a electronic file for transfer (i.e., as an attachment). In any case, it is clear that the Hartley-

Urquhart does not expressly nor inherently (i.e., not necessarily present) disclose an electronic form having electronic fields.

Appellant also emphasizes that the purchase order or associated electronic system disclosed in Hartley-Urquhart does not provide an interface for communicating *directly* with a system of the supplier, as claimed. Indeed, in the cite reference, it is the buyer 220 itself that must update "its ERP system to reflect the issuance and terms of the PO 235." *See* Hartley-Urquhart, col. 4, lines 43-45 and 49-53. Again, in view of these deficiencies, the foregoing claims are patentable over the Hartley-Urquhart reference.

Independent Claims 1, 17, 33, 40

Independent claim 1 recites "receiving *client trade-in data* for a purchasing transaction for medical resources." Independent claim 17 recites "wherein the client data comprises *trade-in data* for a client trade-in with the financial transaction." Independent claim 33 recites "receiving *client trade-in information* for a purchasing transaction for medical resources." Independent claim 40 recites "receiving *client trade-in information* at the financial module."

Conversely, the Hartley-Urquhart reference clearly fails to teach or suggest *client trade-in data* or information. Instead, Hartley-Urquhart is directed to a supply-chain financing system and evaluation of such a system. *See* Hartley-Urquhart, col. 2, lines 14-45; col. 3, lines 16-25. Further, while McCormack and Kalbhen may mention the sale of used equipment over the Internet, the cited references clearly do not teach or suggest *client trade-in data or information*. *See* McCormack, page 2; Kalbhen, page 1. Appellant respectfully emphasizes that the presently claimed subject matter is not simply directed to a purchasing system that may incorporate supply-chain management, or to the electronic exchange of information, but is directed to specific features recited in the

claims. Here, the cited references do not teach *client trade-in data or client trade-in information* in context of the instant claims.

Therefore, claims 1, 17, 33, and 40, and their dependent claims are believed to be patentable over Hartley-Urquhart, McCormack and Kalbhen, taken alone or in combination.

In the Final Office Action, the Examiner stated:

> Regarding trade-in data, it was submitted in the Office action dated January 7, 2005 that McCormick discloses receiving client trade data for a purchasing transaction for medical resources and that it would have been obvious for an artisan of ordinary skill in the art at the time of the invention to integrate the teachings of McCormack into Hartley-Urquhart because an artisan of ordinary skill in the art at the time of the invention would have recognized the growing trend in medical supply chain.

Final Office Action, page 3.

Appellant is not surprised that the Examiner does not cite a specific passage of McCormick in his incorrect contention that "McCormick discloses receiving client trade data." *See* Final Office Action, page 3. After all, McCormick fails to disclose such data. Clearly, again, while McCormick mentions the sale of used equipment over the Internet, it is absolutely devoid of the concept of client trade-in data. *See* McCormack, page 2. McCormick or any of the cited references simply fail to address or account for trade-in data of a client. Therefore, again, the Examiner has failed to establish a *prima facie* case of obviousness.

Independent Claims 1, 17, 33, 40, 49-60

Independent claims 1, 33, 40, 49, 50, and 53-60 recite *"providing a plurality of financial transaction options"* which are "tailored to the client data," and *"transmitting the plurality of financial transaction options* to a client via the network." Independent claims 17, 51 and 52 recite a "financial analysis module being configured to evaluate the client data and to *generate a plurality of financial transaction options* tailored to the client data."

In stark contrast, the cited references, taken alone or in combination, do not teach or suggest a financial analysis system or module that *generates* a plurality of financial transaction *options*. Further, neither reference discloses the *transmission* of financial transaction *options*. In Hartley-Urquhart, for example, the buyer 220 is presented with *no* financial transaction options at all. *See* Hartley-Urquhart, col. 4, lines 53-67. In the Hartley-Urquhart system, the buyer 220 simply accepts the goods, and the bank 230 finances the goods and forwards payment to the supplier 210. No options whatsoever are provided to either the buyer 220 or seller 210. *See* Hartley-Urquhart, col. 5, lines 26-30. Indeed, the bank 230 does not even generate options but merely calculates the payment to the supplier 210. *See* Hartley-Urquhart, col. 5, lines 46-50; col. 8, lines 50-67. Further, while the Hartley-Urquhart system may accommodate a rejection of the transaction by the buyer 220, the buyer 220 is plainly not provided with a plurality of financial transaction options, as claimed. *See* Hartley-Urquhart, col. 9, lines 14-37.

Moreover, the secondary references, McCormack and Kalbhen, are also deficient. In McCormack, the Internet or a network is used to exchange information electronically with no presentation of "options." *See, e.g.*, McCormack, ¶ 4. As for Kalbhen, Appellant has carefully reviewed of the Kalbhen summary list of purchasing sites and there is no indication that financial transaction options are generated or transmitted. *See* Kalbhen, pages 1-4. Both McCormack and Kalbhen are absolutely devoid of a financial analysis

system or module for *generating a plurality of financial transaction options* (tailored to client data) or *providing those transaction options to a client. See* McCormack, pages 1-2 and 5; Kalbhen, pages 1-4.

In view of these deficiencies of both references, independent claims 1, 17, 33, 40, 49-60, and their dependent claims are believed to be patentable over the cited combinations.

In the Final Office Action, the Examiner stated that "[i]n regards to the prior art not suggesting 'providing a plurality of financial transaction options that are tailored to the client' it is interpreted that each invoice and purchase order are inherently based upon customized parameters." Final Office Action, page 4 (emphasis added). In response, Appellant interprets the Examiner's comments to address two separate issues.

First, the Hartley-Urquhart or McCormick purchase orders do not provide a single *financial transaction option*, much less a *plurality* of financial transaction options, as claimed. It should be noted that financial transaction options are not presented on purchase orders. After all, the purchase order is merely a request for a product from a buyer to a supplier.

Second, all three cited references are absolutely devoid of *tailoring* financial transaction options (or tailoring the upstream forms for that matter) *to a specific client* or customer. Appellant respectfully asserts that the Examiner has failed to establish a *prima facie* case of obviousness.

Request Withdrawal of Rejection

For these reasons, Appellant respectfully requests that the Board direct the Examiner to withdraw the rejections under 35 U.S.C. § 103 and to allow the claims.

Rejections of the Independent Claims are Unclear

The Examiner's rejections of the independent claims are vague regarding the various claim features. *See* Office Action Mailed March 21, 2005, pages 2-3.

First, the Examiner pointed to passages in the primary reference (Hartley-Urquhart) that have nothing whatsoever to do with the particular claim feature at issue. *See* Office Action Mailed March 21, 2005, page 2. For example, the Examiner relied on column 3, lines "16+" of the Hartley-Urquhart reference to teach "analyzing the client data in the financial analysis system," as recited in independent claim 1. *See id.* However, the passage cited by the Examiner simply teaches that a financial advisor 230 will discuss with a buyer 220 the disclosed supply-chain financing system. *See* Hartley-Urquhart, col. 3, lines 16-20. This passage clearly has nothing to do with financially analyzing client data with regard to a specific transaction for a medical resource. *See* M.P.E.P. § 707.07 ("The pertinence of each reference, if not apparent, must be clearly explained in each rejected claim specified.").

Second, the Examiner did not demarcate the cited passages of the Hartley-Urquhart reference and cited no passages from the McCormack reference or the Kalbhen reference. *See* Office Action Mailed March 21, 2005, pages 2-3. With Hartley-Urquhart, the Examiner merely mentions a single line in each citation, leaving it to Appellant to guess the length of the passage cited by the Examiner. *See* Office Action, page 3; *see also* 37 C.F.R. § 1.104(c)2; M.P.E.P. § 707.07 ("When a reference is complex or shows or describes inventions other than that claimed by the applicant, the particular part relied on must be designated as nearly as practicable."). Appellant stresses that "[i]n order to provide a complete application file history and to enhance the clarity of the prosecution

history record, an examiner *must* provide clear explanations of all actions taken by the examiner during prosecution of an application." M.P.E.P. § 707.07(d) (emphasis added).

Third, the Examiner attempted to address the specific claim features of only independent claim 1, and ignored features of other independent claims not recited in independent claim 1. *See* Office Action Mailed March 21, 2005, page 2-3. For example, the Examiner did not address the claim feature of a *lease option* as recited in independent claims 33, 49, 51, 53, 55, 56, 57, and 60. The present independent claims are not identical and the Examiner is required to consider all claim features of each and every rejected independent claim in the present application. *See In re Royka*, 490 F.2d 981, 180 U.S.P.Q. 580 (CCPA 1974); M.P.E.P. § 2144.03.

For these reasons, Appellant respectfully requests that the Board direct the Examiner to withdraw the rejections for the additional reasons that the rejections are unclear and the Examiner did not address every recited feature in the independent claims. *See* 37 C.F.R. § 1.104(c)2; M.P.E.P. §§ 706, 707.7, and 2144.03

Features of Dependent Claims Missing from the References

Appellant emphasizes that the dependent claims are also patentable over the cited combinations by virtue of the subject matter that the dependent claims separately recite.

For example, dependent claim 3 recites "*tailoring the form* for the client according to the portion of the client data." Conversely, the Hartley-Urquhart and McCormack references disclose a purchase order (PO) form, for example, with no teaching or suggestion that the *form* or format be altered or tailored to a specific client based on that client's data. *See* Hartley-Urquhart, col. 4, lines 41-55; McCormack, ¶ 4. Indeed, in Hartley-Urquhart, the PO form must be standardized generically so that the PO data can be matched against the Vendor Profile format in the disclose supply-chain

system. *See* Hartley-Urquhart, col. 8, lines 50-51. While the *data entered* into the forms disclosed in these two references *may change* per the particular customer, aspects of the forms themselves are *not tailored* to a specific customer. *See* Hartley-Urquhart, col. 4, lines 41-55; McCormack, ¶ 4. Similarly, Kalbhen does not disclose any type of form tailored to a client. *See* Kalbhen, pages 10-4. Accordingly, dependent claim 3 is believed to be patentable over the cited references, taken alone or in combination, for this reason as well.

Dependent claim 19 recites a financial module comprising "*tax* rules for evaluating *tax* consequences of the financial transaction." Conversely, the cited references are *absolutely devoid* of a financial module having *tax* rules for assessing the impact of *taxes* on a particular transaction. *See, e.g.*, Hartley-Urquhart, col. 3, lines 8-63; col. 5, lines 31-67; McCormack, ¶ 4. While Hartley-Urquhart discloses a supply-chain financing method, McCormack discloses the electronic exchange of purchasing information, and Kalbhen discloses sites for the on-line purchase of used medical equipment, the references clearly do not consider tax consequences of a given financial transaction. *See id.* Accordingly, dependent claim 19 is believed to be patentable over the cited references, taken alone or in combination, for this reason as well.

Dependent claim 39 recites "a plurality of *service* options." In contrast, the cited references never discuss the issue of *servicing* a medical resource. *See, e.g.*, Hartley-Urquhart, col. 3, lines 8-63; McCormack, page 1; Kalbhen, pages 1-4. Accordingly, dependent claim 39 is believed to be patentable over the cited combinations for this reason as well.

The Rejections of the Dependent Claims are Improper

Appellant stresses that the Examiner failed to meet his burden under 35 U.S.C. § 103 in rejecting the dependent claims because the Examiner did not address the subject matter separately recited in the dependent claims. *See, e.g.*, Office Action Mailed March

21, 2005, pages 2-3. To meet his burden of presenting a *prima facie* case of obviousness, the Examiner is required to address the specific elements of each and every claim rejected in the present application. *See In re Royka*, 180 U.S.P.Q. at 580; M.P.E.P. § 2144.03. Here, the Examiner fails to even address the subject matter of a single dependent claim. Appellant must be given "a full and fair hearing." M.P.E.P. § 706.07. Given that the Examiner has not met his burden, the rejections of the dependent claims should be withdrawn for this additional reason.

Furthermore, the Examiner has repeatedly ignored Appellant's prior arguments regarding the features specifically recited in the dependent claims. This lack of response by the Examiner is contrary to the M.P.E.P. Indeed, "[w]here the applicant traverses any rejection, the examiner should, if he or she repeats the rejection, take note of the applicant's argument and answer the substance of it." M.P.E.P. § 707.07(d); *see also* 37 C.F.R. § 1.104; M.P.E.P. § 706.

Improper Combination - Lack of Objective Evidence of Reasons to Combine

In addition, the Examiner has not shown the requisite motivation or suggestion to modify or combine the cited references to reach the present claims. As summarized above, the Examiner must provide <u>objective evidence</u>, rather than subjective belief and unknown authority, of the requisite motivation or suggestion to combine or modify the cited references. *In re Lee*, 61 U.S.P.Q.2d. 1430 (Fed. Cir. 2002). Here, Appellant believes the Examiner employed impermissible hindsight in formulating the present rejection. For example, the Examiner combined the cited references based on the *conclusory and subjective statement* that it would have been obvious to integrate McCormack into Hartley-Urquhart because an artisan "would have recognized the growing trend in medical supply chain management along with the notoriously old and well known high costs associated with the supply chain and have sought [to] provide a

system that would provide affordable, efficient and flexible financing for goods and services." Office Action Mailed March 21, 2005, pp. 3-4.

In other words, the Examiner asserted subjectively that based on an undisclosed "trend" and undisclosed "high costs," a skilled artisan would seek to provide a system that is good. See id. The Federal Circuit has warned that the Examiner must not, "fall victim to the insidious effect of a hindsight syndrome wherein that which only the inventor taught is used against its teacher." *In re Dembiczak*, F.3d 994, 999, 50 U.S.P.Q.2d 52 (Fed. Cir. 1999) (quoting *W.L. Gore & Assoc., Inc. v. Garlock, Inc.*, 721 F.2d 1540, 1553, 220 U.S.P.Q. 303, 313 (Fed. Cir. 1983)). Appellant respectfully request that the Board direct the Examiner to withdraw the foregoing rejections under 35 U.S.C. § 103 for this additional reason.

Request Evidence to Support Official Notice

Lastly, as repeatedly noted by Appellant during prosecution, the Examiner has essentially taken Official Notice of facts outside of the record that the Examiner apparently believes are capable of demonstration as being "well-known" in the art. *See, e.g.*, Office Action Mailed March 21, 2005, pages 3-4. For example, the Examiner stated that an "artisan would have recognized the *growing trend* in medical supply chain management along with the notoriously *old and well known high costs* associated with the supply chain." *Id.* at 3 (emphasis added). Appellant stresses that not only are the Examiner's assertions confusing, the asserted facts are not of "notorious character" or "capable of such instant and unquestionable demonstration to defy dispute." *See* M.P.E.P. § 2144.03. Therefore, again, in accordance with M.P.E.P. § 2144.03, Appellant hereby traverses and challenges the Examiner's use of Official Notice. *See* Response to Office Action mailed March 21, 2005. It should also be noted that Appellant has repeatedly requested that the Examiner produce evidence in support of the Examiner's position as soon as practicable during prosecution.
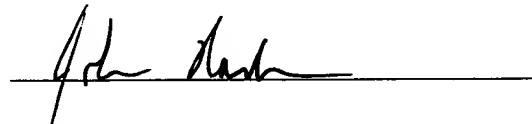
Conclusion

Appellants respectfully submit that all pending claims are in condition for allowance. However, if the Examiner or Board wishes to resolve any other issues by way of a telephone conference, the Examiner or Board is kindly invited to contact the undersigned attorney at the telephone number indicated below.

Respectfully submitted,

Date: <u>November 29, 2006</u>

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8. **APPENDIX OF CLAIMS ON APPEAL**

The following listing of the claims is provided in accordance with 37 C.F.R. §1.121.

1. (previously presented): A method for analyzing transactions for medical resources in a medical facility, the method comprising:

providing access to a financial analysis system for a medical resource supplier via a network;

providing a network interface for communication with the financial analysis system, the network interface including a form for entering client data for medical resources;

receiving the client data from the network interface via the network, wherein receiving the client data comprises receiving client trade-in data for a purchasing transaction for medical resources;

analyzing the client data in the financial analysis system;

providing a plurality of financial transaction options tailored to the client data; and

transmitting the plurality of financial transaction options to a client via the network.

2. (original): The method of claim 1, comprising storing the client data on the financial analysis system.

3. (original): The method of claim 1, comprising storing at least a portion of the client data on a server, and tailoring the form for the client according to the portion of client data.

4. (original): The method of claim 1, comprising coupling the financial analysis system to the Internet, and allowing communications with the financial analysis system via an Internet browser.

5. (original): The method of claim 1, comprising providing medical resource availability information from the medical resource supplier to the client via the network interface.

6. (original): The method of claim 1, comprising electronically accepting applications for purchasing medical resources via the network interface.

7. (original): The method of claim 1, comprising electronically transmitting to the client a purchasing agreement for the medical resources tailored to the client data.

8. (original): The method of claim 1, comprising evaluating tax consequences of a transaction for the medical resources.

9. (original): The method of claim 1, wherein receiving the client data comprises receiving financial information of the client.

10. (canceled).

11. (original): The method of claim 1, wherein providing a plurality of financial transaction options comprises providing a plurality of payment times and payment amounts.

12. (original): The method of claim 1, wherein providing a plurality of financial transaction options comprises providing a plurality of service options.

13. (original): The method of claim 1, wherein providing a plurality of financial transaction options comprises providing a plurality of payment terms and ownership options for the client purchasing the medical resources.

14. (original): The method of claim 13, comprising providing lease and loan options tailored to the client data.

15. (original): The method of claim 1, comprising providing a query page for selecting a medical resource category.

16. (original): The method of claim 1, comprising providing a set of financial rules for analyzing the client data.

17. (previously presented): A system for analyzing resource transactions for a medical facility, the system comprising:

a client computer system for a medical facility;

a transactional analysis system for a medical resource supplier;

a network for coupling the client computer system to the transactional analysis system; and

a financial analysis module operative on the transactional analysis system for determining terms of a financial transaction based upon client data, the client computer system being configured to transmit client data to the financial analysis module, and the financial analysis module being configured to evaluate the client data and to generate a plurality of financial transaction options tailored to the client data, wherein the client data comprises trade-in data for a client trade-in with the financial transaction.

18. (original): The system of claim 17, wherein the financial analysis module comprises a set of financial rules.

19. (original): The system of claim 18, wherein the set of financial rules comprises tax rules for evaluating tax consequences of the financial transaction.

20. (canceled).

21. (original): The system of claim 17, wherein the client data comprises financial data for the medical facility.

22. (original): The system of claim 17, wherein the client data comprises a desired healthcare category.

23. (original): The system of claim 17, wherein the client data comprises a desired option for purchasing a medical resource.

24. (original): The system of claim 23, wherein the desired option comprises a desired service.

25. (original): The system of claim 17, wherein the plurality of financial transaction options comprise a loan option.

26. (original): The system of claim 17, wherein the plurality of financial transaction options comprise a lease option.

27. (original): The system of claim 17, wherein the plurality of financial transaction options comprise a plurality of payment amounts and payment times.

28. (original): The system of claim 17, comprising a client interface configured for exchanging information and procuring a financial transaction between the medical facility and the medical resource supplier via the network.

29. (original): The system of claim 28, wherein the client interface comprises at least one page for displaying the plurality of financial transaction options.

30. (original): The system of claim 28, wherein the client interface comprises a transaction agreement page tailored to the client data.

31. (original): The system of claim 30, wherein the transaction agreement page comprises a loan agreement according to one of the plurality of financial transaction options.

32. (original): The system of claim 30, wherein the transaction agreement page comprises a lease agreement according to one of the plurality of financial transaction options.

33. (previously presented): A method for facilitating a purchasing transaction between a medical resource supplier and a client, the method comprising:

providing access to a transaction system for a medical resource supplier via a network;

providing an interface for exchanging information between a client and the transaction system, wherein the interface has fields for entering client data;

receiving the client data from the interface via the network, wherein receiving the client data comprises receiving client trade-in information for a purchasing transaction for medical resources;

financially analyzing at least a portion of the client data with a financial analysis system operative on the transaction system;

generating a plurality of purchasing options tailored to the client data; and

transmitting the plurality of purchasing options to the client via the network, wherein the plurality of purchasing options comprise lease and loan options.

34. (original): The method of claim 33, comprising coupling the transaction system to the Internet.

35. (original) The method of claim 33, comprising electronically transmitting to the client a purchasing agreement for medical resources tailored to the client data.

36. (original): The method of claim 33, comprising evaluating tax consequences of a purchasing transaction for medical resources according to the client data.

37. (original): The method of claim 33, wherein receiving the client data comprises receiving financial information of the client.

38. (canceled).

39. (original): The method of claim 33, wherein generating a plurality of purchasing options comprises providing a plurality of service options.

40. (previously presented): A method for providing medical resources to a medical facility, the method comprising:

providing access to a financial module for a medical resource supplier via a network;

providing a communication interface comprising fields for transmitting client data to the financial module, wherein the client data includes a medical system category;

receiving client trade-in information at the financial module;

financially analyzing at least a portion of the client data with the financial module;

generating a plurality of transaction options tailored to the client data; and

transmitting the plurality of transaction options to a client via the network.

41. (original): The method of claim 40, comprising electronically transmitting to the client a purchasing agreement for medical resources tailored to the client data.

42. (original): The method of claim 40, comprising evaluating tax consequences of a purchasing transaction for medical resources according to the client data.

43. (original): The method of claim 40, comprising receiving financial information of the client at the financial module.

44. (canceled).

45. (original): The method of claim 40, wherein generating a plurality of transaction options comprises providing a plurality of service options.

46. (original): The method of claim 40, wherein generating a plurality of transaction options comprises providing a plurality of payment terms and ownership options.

47. (original): The method of claim 40, wherein generating a plurality of transaction options comprises providing lease and loan options tailored to the client data.

48. (original): The method of claim 40, comprising displaying the plurality of transaction options on the communication interface.

49. (previously presented): A method for analyzing transactions for medical resources in a medical facility, the method comprising:

providing access to a financial analysis system for a medical resource supplier via a network;

providing a network interface for communication with the financial analysis system, the network interface including a form for entering client data for medical resources;

receiving the client data from the network interface via the network;

analyzing the client data in the financial analysis system;

providing a plurality of financial transaction options comprising a lease option tailored to the client data; and

transmitting the plurality of financial transaction options to a client via the network.

50. (previously presented): A method for analyzing transactions for medical resources in a medical facility, the method comprising:

providing access to a financial analysis system for a medical resource supplier via a network;

providing a network interface for communication with the financial analysis system, the network interface including a form for entering client data for medical resources;

receiving the client data from the network interface via the network;

analyzing the client data in the financial analysis system;

providing a plurality of financial transaction options comprising a loan option tailored to the client data; and

transmitting the plurality of financial transaction options to a client via the network.

51. (previously presented): A system for analyzing resource transactions for a medical facility, the system comprising:

a client computer system for a medical facility;

a transactional analysis system for a medical resource supplier;

a network for coupling the client computer system to the transactional analysis system; and

a financial analysis module operative on the transactional analysis system for determining terms of a financial transaction based upon client data, the client computer system being configured to transmit client data to the financial analysis module, and the financial analysis module being configured to evaluate the client data and to generate a plurality of financial transaction options tailored to the client data, wherein the plurality of financial transaction options comprise a lease option.

52. (previously presented): A system for analyzing resource transactions for a medical facility, the system comprising:

a client computer system for a medical facility;

a transactional analysis system for a medical resource supplier;

a network for coupling the client computer system to the transactional analysis system; and

a financial analysis module operative on the transactional analysis system for determining terms of a financial transaction based upon client data, the client computer system being configured to transmit client data to the financial analysis module, and the financial analysis module being configured to evaluate the client data and to generate a plurality of financial transaction options tailored to the client data, wherein the plurality of financial transaction options comprise a loan option.

53. (previously presented): A method for facilitating a purchasing transaction between a medical resource supplier and a client, the method comprising:

providing access to a transaction system for a medical resource supplier via a network;

providing an interface for exchanging information between a client and the transaction system, wherein the interface has fields for entering client data;

receiving the client data from the interface via the network;

financially analyzing at least a portion of the client data with a financial analysis system operative on the transaction system;

generating a plurality of purchasing options tailored to the client data, wherein the plurality of purchasing options comprise a lease option; and

transmitting the plurality of purchasing options to the client via the network.

54. (previously presented): A method for facilitating a purchasing transaction between a medical resource supplier and a client, the method comprising:

providing access to a transaction system for a medical resource supplier via a network;

providing an interface for exchanging information between a client and the transaction system, wherein the interface has fields for entering client data;

receiving the client data from the interface via the network;

financially analyzing at least a portion of the client data with a financial analysis system operative on the transaction system;

generating a plurality of purchasing options tailored to the client data, wherein the plurality of purchasing options comprise a loan option; and

transmitting the plurality of purchasing options to the client via the network.

55. (previously presented): A method for providing medical resources to a medical facility, the method comprising:

providing access to a financial module for a medical resource supplier via a network;

providing a communication interface comprising fields for transmitting client data to the financial module, wherein the client data includes a medical system category;

financially analyzing at least a portion of the client data with the financial module;

generating a plurality of transaction options tailored to the client data, wherein generating a plurality of transaction options comprises providing lease and loan options tailored to the client data; and

transmitting the plurality of transaction options to a client via the network.

56. (previously presented): A program for facilitating a purchasing transaction between a medical resource supplier and a client, comprising:

a machine readable medium; and

machine readable code disposed on machine readable medium and adapted for:

providing access to a transaction system for a medical resource supplier via a network;

providing an interface for exchanging information between a client and the transaction system, wherein the interface has fields for entering client data;

receiving the client data from the interface via the network, wherein receiving the client data comprises receiving client trade-in information for a purchasing transaction for medical resources;

financially analyzing at least a portion of the client data with a financial analysis system operative on the transaction system;

generating a plurality of purchasing options tailored to the client data; and

transmitting the plurality of purchasing options to the client via the network, wherein the plurality of purchasing options comprise lease and loan options.

57. (previously presented): A program for facilitating a purchasing transaction between a medical resource supplier and a client, comprising:

a machine readable medium; and

machine readable code disposed on machine readable medium and adapted for:

providing access to a transaction system for a medical resource supplier via a network;

providing an interface for exchanging information between a client and the transaction system, wherein the interface has fields for entering client data;

receiving the client data from the interface via the network;

financially analyzing at least a portion of the client data with a financial analysis system operative on the transaction system;

generating a plurality of purchasing options tailored to the client data, wherein the plurality of purchasing options comprise a lease option; and

transmitting the plurality of purchasing options to the client via the network.

58. (previously presented): A program for facilitating a purchasing transaction between a medical resource supplier and a client, comprising:

a machine readable medium; and

machine readable code disposed on machine readable medium and adapted for:

providing access to a transaction system for a medical resource supplier via a network;

providing an interface for exchanging information between a client and the transaction system, wherein the interface has fields for entering client data;

receiving the client data from the interface via the network;

financially analyzing at least a portion of the client data with a financial analysis system operative on the transaction system;

generating a plurality of purchasing options tailored to the client data, wherein the plurality of purchasing options comprise a loan option; and

transmitting the plurality of purchasing options to the client via the network.

59. (previously presented): A program for providing medical resources to a medical facility, comprising:

a machine readable medium; and

machine readable code disposed on machine readable medium and adapted for:

providing access to a financial module for a medical resource supplier via a network;

providing a communication interface comprising fields for transmitting client data to the financial module, wherein the client data includes a medical system category;

receiving client trade-in information at the financial module;

financially analyzing at least a portion of the client data with the financial module;

generating a plurality of transaction options tailored to the client data; and

transmitting the plurality of transaction options to a client via the network.

60. (previously presented): A program for providing medical resources to a medical facility, comprising:

a machine readable medium; and

machine readable code disposed on machine readable medium and adapted for:

providing access to a financial module for a medical resource supplier via a network;

providing a communication interface comprising fields for transmitting client data to the financial module, wherein the client data includes a medical system category;

financially analyzing at least a portion of the client data with the financial module;

generating a plurality of transaction options tailored to the client data, wherein generating a plurality of transaction options comprises providing lease and loan options tailored to the client data; and

transmitting the plurality of transaction options to a client via the network.

9.   **APPENDIX OF EVIDENCE**

None.

10. **APPENDIX OF RELATED PROCEEDINGS**

None.